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January 30, 2017

**By ECF**

Honorable Valerie E. Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Anand Gupta v. Al Jazeera America, LLC ("AJAM")  
and Al Anstey, Case No. 16 Civ. 02980

Dear Judge Caproni:

The parties to this action jointly request a 20-day extension of the deadline for close of fact discovery from February 3, 2017 to February 23, 2017. This is the parties' first request to extend the discovery deadline, and we respectfully submit that good cause exists for the parties' joint request. Specifically, the parties have been cooperating to schedule numerous depositions of third party witnesses, including two who are out-of-state and one who is out of the country (in Doha, Qatar) and also to narrow the scope of any remaining discovery disputes between the parties.

The parties have diligently engaged in the discovery process so far. Collectively, the parties have exchanged over 10,000 pages of documents in response to over 300 document requests. Further, the parties have now completed five depositions, including deposing the plaintiff (who currently lives in India) and the individual defendant (who resides in the United Kingdom), and two additional depositions of former employees of defendant AJAM are scheduled to occur this week. Certain third-party witnesses who were timely noticed and subpoenaed are presently unavailable due to scheduling conflicts prior to February 3, but they are cooperating with counsel to the parties to schedule their depositions by mid-February. The parties therefore request an extension of the current deadline to accommodate the schedules of these third party witnesses.

The parties have also communicated on many occasions regarding discovery issues and narrowed requests to avoid the need for the Court's involvement, and are in the process of negotiating resolutions to a number of such discovery disputes. See Zimmerman v. 3M Co., No. 02 CV 0806 ESC, 2007 WL 521273, at \*3 (W.D.N.Y. Feb. 12, 2007) (existence of discovery disputes provided good cause to extend discovery deadline). With the requested extension to the discovery deadline, counsel to the parties remain confident that they can further narrow, if not avoid entirely, raising these issues with the Court.

For these reasons, the parties respectfully request a 20-day extension of the fact discovery deadline from February 3, 2017 to February 23, 2017 as well as an adjournment of the pretrial conference that is currently scheduled for February 10, 2017 at 10:00 a.m. to February 24, 2017 or such other date as may be mutually convenient for the Court and counsel.

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Respectfully submitted,

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